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Federal Communications Commission
Office of Secretary

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)

Amendment to Section 73.202(b),)
Table of Allotments, FM Broadcast Stations)
(Cameron, LA))

MB Docket No. 05-138
RM-11162

Filed With: **Office of the Secretary**

Directed To: **Assistant Chief, Audio Division**
Media Bureau

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COUNTERPROPOSAL

Pittman Broadcasting Services, LLC. ("Pittman"), by its attorney, hereby submits a Counterproposal in this proceeding, and requests the following amendment to Section 73.202(b) of the Commission's rules, the FM Table of Allotments:

	<u>Present</u>	<u>Proposed</u>
Hackberry, LA	None	296A

The proposal would add a first local service to Hackberry, Louisiana. In support of this proposal, the following is stated:

Technical Showing:

As the attached engineering statement shows, the proposed allotment meets the spacing and city-grade coverage requirements imposed in Sections 73.207 and 73.315 of the rules. The new station at Hackberry would serve an area of 2,045 square kilometers with a population of 16,848 persons.

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Hackberry, LA

Hackberry, Louisiana needs and can support a radio station. Hackberry is located in Southwestern Louisiana. According to the 2000 Census, the city's population is 1,699 persons. There are 818 homes in the City of Hackberry. The City has its own Zip Code 70645. The city's schools, including Hackberry High School, have approximately 275 students and are operated by the Cameron Parish school district.

Hackberry is home to numerous retail and service businesses including a bank. Hackberry also is home to three churches, The First Baptist Church, St Peter's Catholic Church, and United Pentecostal Church.

According to 2000 Census data, there are 1639 total households in Hackberry. Hackberry has its own Fire Department. The Hackberry Recreation Center is located in the city to serve the needs of the community.

The median age of Hackberry residents is 37 years old and the average income is \$37,366 which is much higher than many nearby cities. These figures show the existence of a retail-based economy which Petitioner believes will support a local radio station.

If the Commission allocates Channel 296A to Hackberry, LA, Pittman expeditiously will participate in any auction and/or file an application for the new facility, and if its application is approved, Pittman will construct and operate a new station at Hackberry.

Conclusion

The proposed addition of a new station on Channel 296A at Hackberry will serve the public interest by providing a first local service to this hub community. The new allocation can be accommodated without modification of the license of any existing station or substitution of any existing allocation.

WHEREFORE, it is respectfully requested that Channel 296A be added as Hackberry, Louisiana's first local aural service, as well as its first local FM allotment.

**PITTMAN BROADCASTING
SERVICES, LLC**

By: _____

Dan J. Alpert

Its Attorney

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May 10, 2005

ENGINEERING STATEMENT
PREPARED FOR
PITTMAN BROADCASTING SERVICES, LLC
HACKBERRY, LOUISIANA
CH 296A 6 KW 100 KW

This Engineering Statement and the attached Figures 1 and 2 were prepared on behalf of Pittman Broadcasting Services, LLC ("Pittman"), in support of comments in MB Docket No. 05-138. In that docket, it is proposed to allot FM Channel 296C3 to Cameron, Louisiana. As a counterproposal, Pittman seeks to allot Channel 296A to Hackberry, Louisiana.

Figure 1 attached is a separation study, which demonstrates that FM Channel 296A can be allotted to Hackberry in accordance with the requirements of 47 CFR 73.207. For this study, the following reference geographic coordinates were employed:

29° 56' 31" North Latitude

93° 26' 24" West Longitude.

From this location, and with maximum Class A facilities (6 KW, 100 M) all of Hackberry is within the predicted 70 dBu (3.16 mV/m) contour. Hackberry had a 2000 Census population of 1699 persons within a land area of 242.9 sq. km. The predicted 60 dBu (1.0 mV/m) contour will provide service to 16,848 persons in a land area of 2,045 square kilometers. Additionally, the percentage of 60 dBu land area coverage by the proposed Class A operation is 81 percent.

Comparing the Class 296A proposal at Hackberry with the Channel 296C3 proposal at Cameron shows that potential coverage from both is similar. The Cameron 2000 Census population was 1965 persons in a land area of 67.4 sq. km. The land area of Cameron is approximately one-quarter that of Hackberry. The predicted Cameron 60 dBu coverage is to 17,034 persons in a land area of 2,541 sq. km. A large difference is the percentage of 60 dBu land area coverage: for Cameron, 53 percent and for Hackberry, 81 percent. The efficient use of the channel at Hackberry is remarkable. Additionally, the Class A channel at Hackberry has less preclusive impact on the use of pertinent cochannel and adjacent channels.

The attached map, Figure 2, shows the predicted 60 dBu coverage contours for both the Hackberry and Cameron proposals. The allotment of Channel 296A to Hackberry will bring the first local broadcast service to that community while providing for much greater frequency usage efficiency than can be obtained with channel 296C3 at Cameron.

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May 9, 2005

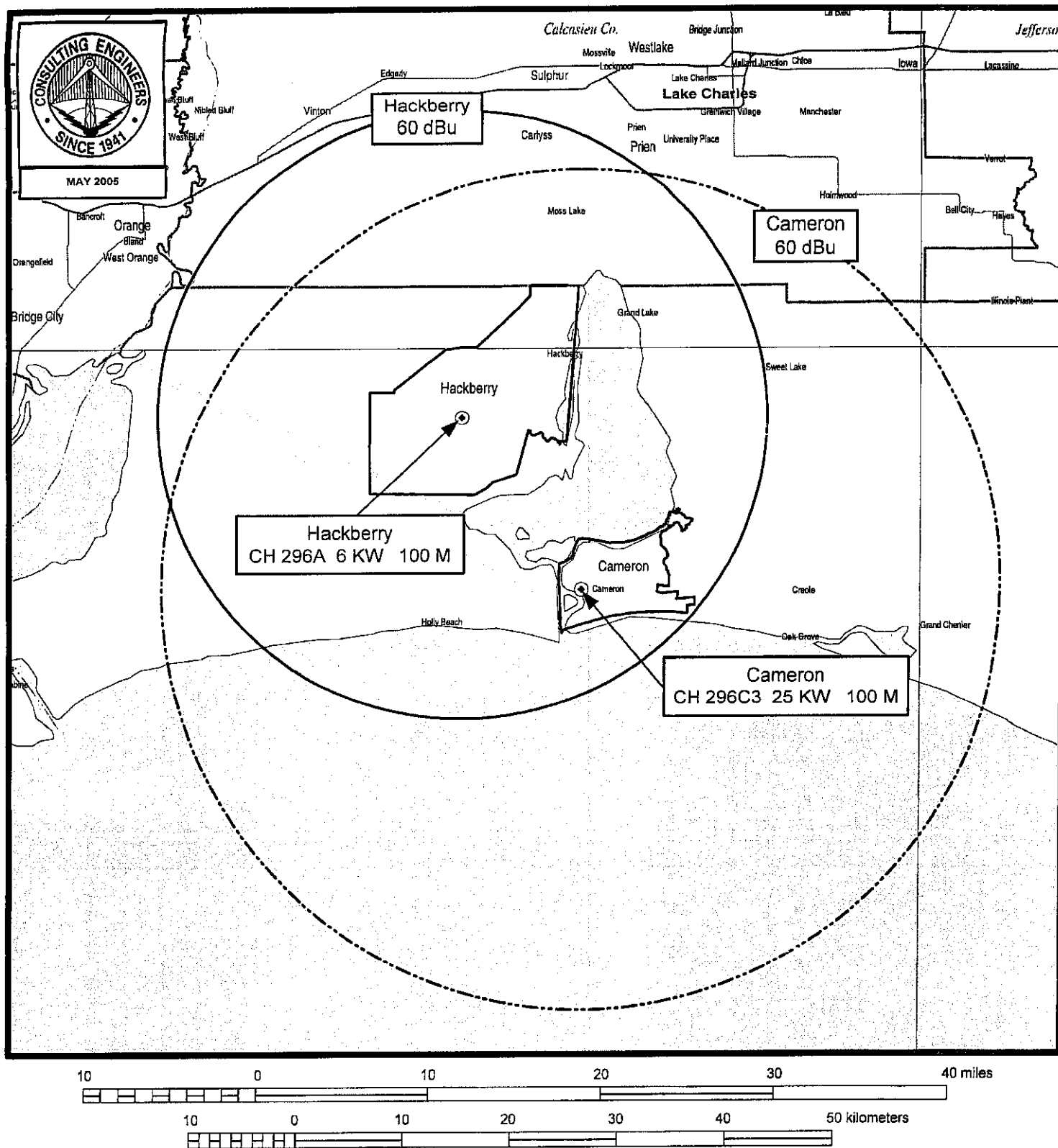
Figure 1

PITTMAN BROADCASTING SERVICES, LLC
HACKBERRY, LOUISIANA
CH 296A 6KW 100M

FM SEPARATION STUDY
(29-56-31 93-26-24)

Call Id	City St	Status	File Num	Channel Freq	ERP HAAT	DA Id	Latitude Longitude	73 215	Bear	Dist. (km)	Req. (km)
0	IOWA LA	ADD	RM DD-127	293 A 106.5	0.000		30-13-19 093-05-39		46.8	45.55 14.55	31.0 Close
KHPT 69564	CONROE TX	LIC	BLH 19980617KB	295 C 106.9	100.000 579	N	30-13-53 095-07-26	N	281.7	165.47 0.47	165.0 Close
0	CAMERON LA	ADD	RM 11162	296 C3 107.1	0.000		29-47-48 093-19-30		145.5	19.56 -122.44	142.0 Short
KOGM 33220	OPELOUSAS LA	LIC	BMLH 19850405KS	296 A 107.1	3.000 62	N	30-31-31 092-06-17	N	62.8	143.89 28.89	115.0 Clear
KWLV 73236	MANY LA	LIC	BLH 19910319KD	296 C3 107.1	25.000 77	N	31-36-27 093-24-05	N	1.1	184.68 42.68	142.0 Clear
KJAS 15921	JASPER TX	LIC	BLH 20040402AAN	297 C3 107.3	8.000 100	N	30-58-31 093-59-24	Y	335.5	126.14 37.14	89.0 Clear
KJMH 22962	LAKE ARTHUR LA	LIC	UR BLH 19980902KA	298 C2 107.5	50.000 141	Y 15090	30-12-07 092-56-47	Y	58.5	55.64 0.64	55.0 Close

Figure 2



PREDICTED COVERAGE CONTOURS

PITTMAN BROADCASTING SERVICES, LLC

HACKBERRY, LOUISIANA

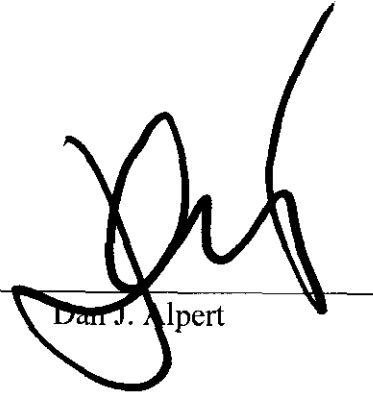
CH 296A 6 KW 100 M

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

CERTIFICATE OF SERVICE

I, Dan J. Alpert, hereby certify that the foregoing Comments have been served on the following:

Charles Crawford, Esq.
4553 Bordeaux Avenue
Dallas, TX 75205



Dan J. Alpert